

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____]	
UNITED STATES OF AMERICA]	
]	
- against -]	
]	05CR30002-MAP
ARMANDO BOTTA]	
_____]	

ARMANDO BOTTA'S REQUEST FOR A BILL OF PARTICULARS

Now comes the defendant, Armando Botta, by and through his attorney, Lori H. Levinson, and hereby moves pursuant to Rule 7(g) of the Federal Rules of Criminal Procedure for a Bill of Particulars to be filed by the government.

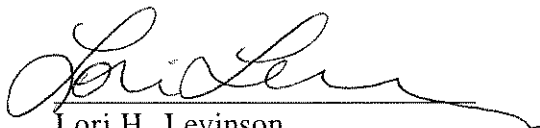
As grounds therefore, the defendant states that he is unable to ascertain from the face of the indictment and the discovery provided to date the nature of the case against him because of the lack of specificity contained in the indictment and discovery.

Therefore, the defendant requests that the government state the following information in a Bill of Particulars:

1. The exact date, time and place where the defendant first participated in any act in support of or in furtherance of the alleged conspiracy;
2. The exact dates(s), time(s) and place(s) where the defendant participated in any further acts in support of or in furtherance of the conspiracy;
3. A precise description of the nature of any acts or statements defendant allegedly engaged in or uttered to further the alleged conspiracy. Include the name, address and phone number of each person present when such acts were committed;
4. Exactly how federal or state law enforcement officials determined the defendant was involved in a conspiracy. Produce all information or evidence supporting this belief;
5. The exact date, time and place where and when the conspiracy began. State the name, address and phone number of all persons present when the conspiracy began;

6. The exact date, time and place when and where the defendant joined in the conspiracy. State the name, address and phone number of all persons present when defendant joined the conspiracy;
7. Precisely state the conduct of co-conspirators in furtherance of the conspiracy that was know to the defendant or was reasonably foreseeable;
8. A precise description of information or evidence, including the name, address and phone number of all persons having knowledge that the defendant conspired with anyone;
9. Identify and provide addresses and phone numbers of all persons who were allegedly co-conspirators. Specify when they joined or left the conspiracy and exactly what their participation was;
10. Specify whether the alleged conspiracy was express or implied on the part of the defendant and each co-conspirator. If express, state the express agreement. If implied from acts, meetings or statements, please describe them;
11. Particularize any overt act, threat or extortionate means which the defendant is alleged to have committed in the process of collecting an extension of credit, the date, place and the names of the persons present when any of these acts took place;
12. Particularize the extortionate means the defendant utilized to collect extensions of credit, including the date, place and the names of the persons present;
13. Specify the date, time and place when any victim was placed in fear and what specifically the extortionate act was that caused said fear;
14. Specify the date, time and place the defendant aided and abetted, and what he aided and abetted.

Respectfully submitted,
ARMANO BOTTA
By His Attorney

A handwritten signature in black ink, appearing to read "Lori H. Levinson", written over a horizontal line.

Lori H. Levinson
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Dated: January 6, 2006